

**Filed Under Seal**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 20-CR-\_\_\_\_\_**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**DONTE TAYLOR** : **VIOLATIONS:**  
: **18 U.S.C. § 924(a)(1)(A) (false statement to a**  
: **federal firearms licensee – 3 counts)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNTS ONE THROUGH THREE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Lock's Philadelphia Gun Exchange ("Lock's Gun Exchange"), located at 6700 Rowland Avenue, Philadelphia, Pennsylvania 19149, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.
2. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.
3. The rules and regulations governing FFL holders require that a person seeking to purchase a firearm fill out a Firearm Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 contains language warning that "making any false oral or written statement . . . is a crime punishable as a felony under Federal law" and falsely

stating that the purchaser is the “actual transferee/buyer” of the firearm(s) listed on the form, when in fact the purchaser is not the “actual transferee/buyer,” is “a crime punishable as a felony under Federal law . . . .”

4. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth.

5. On or about the dates listed below, each date constituting a separate offense, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**DONTE TAYLOR,**

in connection with the acquisition of each of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the FFL holders’ records, in that defendant TAYLOR certified on the Form 4473 that he was the actual transferee/buyer of each firearm listed below, when in fact, as defendant TAYLOR knew, this statement was false and fictitious because, the actual transferee/buyer of each firearm were persons other than defendant TAYLOR:

Count	Date	FFL	Firearm(s)	Serial No.
1	January 31, 2019	Lock’s Gun Exchange	Glock, Model 22, .40 caliber S&W pistol	BCXS644
			HWM, Model BA/R, 357 Magnum revolver	1713124
2	February 14, 2019	Lock’s Gun Exchange	Taurus, Model G2C, 9mm pistol	TLZ50726
3	March 19, 2019	Lock’s Gun Exchange	Glock, Model 27, .40 caliber S&W pistol	YEF263
			Glock, Model 23, .40 caliber S&W pistol	BCDY514

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A), set forth in this indictment, defendant

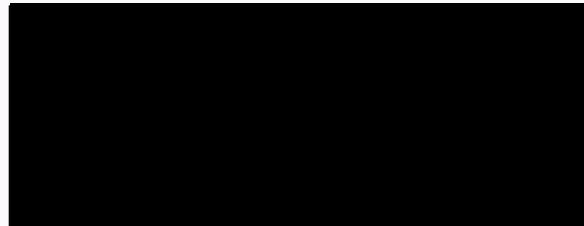
**DONTE TAYLOR**


shall forfeit to the United States of America all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. Glock, Model 22, .40 caliber S&W pistol, bearing serial number BCXS644;
2. HWM, Model BA/R, 357 Magnum revolver, bearing serial number 1713124;
3. Taurus, Model G2C, 9mm pistol, bearing serial number TLZ50726;
4. Glock, Model 27, .40 caliber S&W pistol, bearing serial number YEF263; and
5. Glock, Model 23, .40 caliber S&W pistol, bearing serial number BCDY514.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**



  
**WILLIAM M. McSWAIN**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**DONTE TAYLOR**

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**INDICTMENT**

Counts

**18 U.S.C. § 924(a)(1)(A) (false statement to a federal firearms licensee – 3 counts)**

**Notice of forfeiture**

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Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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